

Carol Thompson
Michigan State Housing Development Authority
735 E. Michigan Ave.
P O Box 30044
Lansing, Mi 48909
Thompsonc7@michigan.gov

Dear Ms. Thompson,

I am writing to submit comment on the Draft 2008 Qualified Allocation Plan. Thanks for giving me the opportunity to respond to this plan. My name is Sue Hart and I have been working as a housing advocate at The Disability Network in Flint; a Center for Independent Living, for about eight years. I am also the Co-Chairperson for the Michigan Housing Disability Workgroup. We consist of various agencies around the State that advocate for the accessible, affordable, integrated housing rights of people with disabilities and seniors.

One major and very important component of independent living is the right to obtain adequate housing. The lack of accessible, affordable housing is a huge problem for people with disabilities and many seniors. The problem of scarcity of affordable housing is magnified for people with disabilities: It doesn't do any good to find scarce affordable housing if you can't get in the door. Some important concepts of physically accessible housing for people with disabilities and seniors who want to age in place are physical accessibility, visitability, and universal design. The building of the new housing within this 2008 QAP should at the very least abide by the various fair housing laws such as Section 504 and the Americans With Disabilities Act.

For the over 2 million people with disabilities and seniors in Michigan (http://factfinder.census.gov/servlet/ACSSAFFFacts?_event=Search&geo_id=&_geoContext=&_street=&_county=&_cityTown=&_state=04000US26&_zip=&_lang=en&_sse=on&pctxt=fph&pgsl=010) one of the most frustrating aspects is the use of public funds to perpetuate the building of inaccessible housing.

This issue is important to me because people with mobility impairments in Michigan continue to experience a severe shortage of housing they

can get into. As a result, some people with long-term care needs are going into nursing facilities, at great cost to taxpayers! Without access, people cannot join their friends, or network with job or business prospects. By 2011 the first wave of the 76 million Baby Boom generation begins turning 65 and 90% of them polled by AARP stated that they want to remain in their homes and that is not feasible if they are not built with accessibility features. National Association of Home Builders said universal design and/or making homes more accessible for the elderly and disabled would be one of the top future trends in remodeling. Hospital discharge planners could safely send people with mobility impairments home, not to nursing homes at a base cost to taxpayers of \$4,710 month, plus medications and treatment. For more info: <http://www.aarp.org/bulletin/longterm/Articles/a2003-10-30-dailycost.html> .

The Michigan Land Use Leadership Council also came up with 10 ways to make Michigan prosper and they encouraged the State legislature to be particularly mindful of people with disabilities. Along with requiring visitability legislation in all new homes and support existing accessibility laws and regulations. They stressed that designated commerce centers and recognized planning should emphasize compact design, conveniently mixed uses and locations that people with disabilities can easily reach and that and that planners should listen to us so we are not left behind.

The true magnitude of the homelessness crisis in Michigan and the US remains hidden from most Americans – including most elected and appointed officials who could do something about it. To learn its full dimensions, one must look behind the doors of nursing homes, institutions, and substandard board and care homes where people with disabilities are “placed” because they cannot afford decent housing in the community.

Community integration proposals recently submitted to the U.S. Department of Health and Human Services (HHS) identified 25,000 people across 17 states who will move from costly facilities supported with Medicaid and state government funds to housing in the community during the next few years a very small percentage of the hundreds of thousands of people with disabilities who today may be living

unnecessarily in restrictive settings primarily because there is no affordable housing available.

Hundreds of thousands of other adults with serious and long-term disabilities have “hidden” housing problems because they continue to live tenuously at home with aging parents.⁴ These parents have saved the government – and the taxpayers – enormous sums of money by continuing to provide housing and support for their adult children. Many of these parents need care themselves. They simply want the assurance that their adult child will have a decent, safe, affordable and accessible home in the community – linked with supportive services if needed – when they are no longer able to provide it.

In addition to people who receive SSI, the high cost of rental housing also affects many people receiving Social Security Disability Income (SSDI) or Veterans Administration (VA) benefits. Tragically, a significant percentage of veterans of the Iraq and Afghanistan wars are or will be eligible for VA disability payments. Based on current benefit levels and rental housing costs, many of these brave Americans will also be priced out of the rental housing market. HHS Community Integration Policies at Risk of Failure.

Ironically, current federal policies – including HHS “Money Follows the Person” and Real Choice Systems Change initiatives – are intended to help people eligible for SSI to move from institutional settings or their family home to integrated housing of their choice in the community. Disability advocates repeatedly have warned federal officials that HHS policies promoting community integration will fail unless there is a parallel commitment to significantly increase federal housing programs targeted to people with disabilities at SSI income levels.

Despite the obvious need, not one new federal housing resource has been created to ensure that decent, safe, affordable and accessible housing will be available when people participating in these HHS initiatives are ready to move into the community. Incredibly, since these HHS initiatives were announced, HUD has repeatedly proposed to eliminate the development of new units under the Section 811 Supportive Housing for Persons with Disabilities program – the federal program specifically created for this purpose.

Over the past decade, the supply of new Section 811 units produced each year has plunged from more than 3,500 units in the mid-1990s to a mere 790 units projected for 2007. It is truly shocking that despite current HHS initiatives and the community integration mandates of the 1999 U.S. Supreme Court Olmstead decision, recent HUD budget proposals recommended the complete elimination of all new Section 811 housing production. I believe that this 2008 QAP will help to address this issue of community integration within Michigan for people that are in need of supportive housing services with the set asides listed below:

- Ten percent of all units in any given project (that is not already submitted as a Special Needs/Supportive Housing projects) shall be given leasing priority for Supportive Housing Tenants who meet MSHDA's Supportive Housing Tenant definition with rents structured at or below 30% of AMI".**
- that a significant portion of the 20% holdback for Supportive Housing/Housing for Persons with Special Needs ... is allocated to supportive housing for all other population groups that meet the QAP definitions of Special Needs and Homeless, including but not limited to: Domestic Violence Survivors, and Consumers of Mental Health Services...**

People who rely on SSI are also priced out of federally financed "affordable" rental units, including those created through the federal Low Income Housing Tax Credit (LIHTC) program. People with disabilities living on SSI payments equal to 18.2 percent of median income simply cannot move in to LIHTC-financed "affordable" units unless they have rent subsidies. 96.5% of SSI is needed within Michigan to rent a one bedroom housing unit.

<http://www.tacinc.org/Docs/HH/PricedOutIn2006.pdf>

Providing this type of "deep" rental subsidy to ensure affordability for the lowest-income households has historically been the responsibility of the federal government. HUD's current leadership argues that it is "too expensive" to provide housing for the poorest Americans and that

scarce federal housing subsidy funding should be directed “more efficiently” to higher-income households who cost less to serve. The set aside within the 2008 QAP listed below is an effort to address the nation’s most serious housing crisis, the federal rent subsidy resources they need to ensure affordability for people with SSI-level incomes.

- 10% of the LIHTC units in a development must have income and rents set at 30% of median income (inclusive of existing units). A deep subsidy contract for a minimum of 5 years will satisfy this requirement.**

Thanks for giving me the opportunity to submit on the 2008 QAP.

Sincerely,

**Sue Hart.
The Disability Network
Michigan Housing Disability Workgroup
3600 S. Dort Hwy. Suite 54
Flint, Mi 48507**

